



1 MICHAEL P. LOWRY, ESQ.
2 Nevada Bar No. 10666
3 E-mail: Michael.Lowry@wilsonelser.com
4 JONATHAN C. PATTILLO, ESQ.
5 Nevada Bar No. 13929
6 E-mail: Jonathan.Pattillo@wilsonelser.com
7 300 South 4th Street, 11th Floor
8 Las Vegas, NV 89101-6014
9 Tel: 702.727.1400/Fax: 702.727.1401
10 Attorneys for Keolis Transit Services, LLC

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

18 ERIC TAYLOR, individually

Case No.: 2:20-cv-778

19 Plaintiff,

20 **Keolis Transit Services, LLC's Petition
for Removal**

21 vs.
22 LOYD GRANDT, an individual; KEOLIS TRANSIT
23 SERVICES, LLC., a foreign corporation; DOES 1
24 through 20; ROE CORPORATIONS 1 through 10
25 AND ROE LIMITED LIABILITY COMPANIES 1
26 through 10, inclusive.

27 Defendant.

28 Keolis Transit Services, LLC petitions to remove this case to the United States District
Court for the District of Nevada from the Eighth Judicial District Court for the State of Nevada.
This petition for removal is signed per Rule 11.

Removal is appropriate per 28 U.S.C. § 1441 because diversity jurisdiction is present per
28 U.S.C. 1332. “[T]he core principle of federal removal jurisdiction on the basis of diversity --
namely, that it is determined (and must exist) as of the time the complaint is filed and removal is
effected.”¹ There are three named parties. Plaintiff alleges he is a resident of Nevada.² When the
complaint was filed defendant Loyd Grandt had become a resident of California. Keolis Transit
Services, LLC is a wholly owned subsidiary of Keolis Transit America, Inc., a Delaware
corporation with its principal place of business in Massachusetts.

¹ *Strotek Corp. v. Air Transp. Ass'n of Am.*, 300 F.3d 1129, 1131 (9th Cir. 2002).

² ECF No. 1-2 at ¶ 1.

1 The amount in controversy is also satisfied. Before filing his lawsuit, Plaintiff indicated he
2 has sustained damages of at least \$84,765.80.³ This amount alone exceeds the \$75,000 diversity
3 jurisdiction threshold.

4 The complaint was filed on April 1, 2020 and Keolis was served on April 10, 2020.
5 Removal is timely and has occurred within one year.

6 DATED this 30th day of April, 2020.



10 BY: /s/ Michael P. Lowry
11 MICHAEL P. LOWRY, ESQ.
12 Nevada Bar No. 10666
13 JONATHAN C. PATTILLO, ESQ.
14 Nevada Bar No. 13929
15 300 South 4th Street, 11th Floor
16 Las Vegas, NV 89101-6014
17 Tel: 702.727.1400/Fax: 702.727.1401
18 Attorneys for Keolis Transit Services, LLC

³ ECF No. 1-3.

Certificate of Service

Pursuant to FRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on April 30, 2020, I served **Keolis Transit Services, LLC's Petition for Removal** as follows:

by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;

via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Pacific West Injury Law
Kristopher Helmick, Esq.
6141 S. Rainbow Blvd. Suite 110
Las Vegas, NV 89118
P: 702-602.4878

BY: /s/ Amanda Hill
An Employee of
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